

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	INDICTMENT
	:	
- v. -	:	Sl 21 Cr. 190 (JPO)
	:	
JOHNNY ROMAN, and	:	
MARIAH JAQUEZ,	:	
	:	
Defendants.	:	
- - - - -	X	

COUNT ONE

(Sexual Exploitation of a Child)

The Grand Jury charges:

1. On or about May 14, 2020, in the Southern District of New York and elsewhere, JOHNNY ROMAN, the defendant, knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by

computer, and the visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and aided and abetted the same, to wit, at ROMAN's request and direction, a female co-conspirator ("CC-2") filmed herself with her cellular phone while she performed oral sex on a minor victim ("Victim-1") and transmitted such videos to ROMAN.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT TWO

(Sexual Exploitation of a Child)

The Grand Jury further charges:

2. On or about July 22, 2020, in the Southern District of New York and elsewhere, JOHNNY ROMAN, the defendant, knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting

interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and aided and abetted the same, to wit, ROMAN induced a minor female ("Vicim-2") to engage in and film sexually explicit acts with a minor child ("Victim-3") and transmit those videos on an online messaging service.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT THREE

(Sexual Exploitation of a Child)

The Grand Jury further charges:

3. On or about October 2, 2020, in the Southern District of New York and elsewhere, JOHNNY ROMAN and MARIAH JAQUEZ, the defendants, knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and

affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and aided and abetted the same, to wit, at ROMAN's request and direction, JAQUEZ filmed herself with her cellular phone while she performed oral sex on a minor victim ("Victim-4") and transmitted such videos to ROMAN.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT FOUR

(Extortionate Communications)

The Grand Jury further charges:

4. From at least on or about July 2020 to at least on or about December 2020, in the Southern District of New York and elsewhere, JOHNNY ROMAN, the defendant, with intent to extort from a person things of value, transmitted in interstate and foreign commerce a communication containing a threat to injure the property and reputation of the addressee, and aided and abetted the same, to wit, ROMAN threatened to post online videos depicting MARIAH JAQUEZ, Victim-2, and a female co-conspirator ("CC-3") engaged in sexual conduct, unless JAQUEZ, Victim-2, and CC-3 complied with ROMAN'S requests to contact ROMAN and/or make sexually explicit videos with minor victims.

(Title 18, United States Code, Sections 875(d) and 2.)

FORFEITURE ALLEGATIONS

5. As a result of committing the offenses alleged in Counts One through Three of this Indictment, JOHNNY ROMAN and MARIAH JAQUEZ, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from said offense and any and all property, real or personal, used or intended to be used to commit or promote the commission of said offense or traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

6. As a result of committing the offense alleged in Count Four of this Indictment, JOHNNY ROMAN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461, any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.


Substitute Assets Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2253;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



AUDREY STRAUSS
United States Attorney

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JOHNNY ROMAN, and
MARIAH JAQUEZ,

Defendants.

INDICTMENT

S1 21 Cr. 190 (JPO)

(18 U.S.C. §§ 2251(a), (e), 875(d), and
2.)

AUDREY STRAUSS

United States Attorney


Foreperson
